

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

THEODORE WILLIAMS, *et al.*

PLAINTIFFS

V.

CIVIL ACTION NO. 1:16-CV-266-KS-MTP

**GARY HARGROVE, in his individual capacity
and his official capacity, *et al.***

DEFENDANTS

DEFENDANTS' *AMENDED* MOTION FOR RESTRICTED ACCESS

The Defendants, GARY HARGROVE, in his individual and official capacity as Coroner of Harrison County and HARRISON COUNTY BOARD OF SUPERVISORS, and HARRISON COUNTY, MISSISSIPPI, file this *Amended* Motion for Restricted Access,¹ to-wit:

1. Defendants have filed their *Amended* Reply to Plaintiffs' Response to Motion for Summary Judgment [Doc. 175] and *Amended* Supporting Memorandum [Doc. 176].

2. That in order to serve the purpose of Defendants' *Amended* dispositive Rebuttal [Doc. 175], this Court and the parties to this suit must have restricted access to the confidential Coroner Files and local news video that Defendants have attached as exhibits to their *Amended* Rebuttal [Doc. 176].

3. That these Coroner's Files and local news video are cited to in the Defendants' *Amended* Rebuttal and *Amended* Supporting Memorandum, and are in the possession of all parties, but cannot be attached to Defendants' *Amended* Rebuttal unless this Court enters an

¹ Defendants' earlier filed Motion for Restricted Access [Doc. 174] is timely amended herein to include *EXHIBIT "N"*, which was unintentionally omitted from Defendants' Motion [Doc. 174].

Order granting restricted access to these Coroner's Files, as they under the protection of a Protective Order [Doc. 61]. Additionally, the local news video (*EXHIBIT "I"*) must be filed *via* Compact Disc for streaming purposes.

4. That these Coroner's Files and local news video will be sent to the Court and opposing counsel as *EXHIBITS "F," "G," "H," "I," "K" and "N"*.

5. That Defendants will be providing these Coroner's Files and local news video to this Court and opposing counsel *via* Compact Discs.

WHEREFORE PREMISES CONSIDERED, the Defendants move the Court to grant restricted access to *EXHIBITS "F," "G," "H," "I," "K" and "N"*.

RESPECTFULLY SUBMITTED, this the 11th day of December, 2017.

**GARY HARGROVE,
in his individual and official capacity**

By: /s/ DANIEL T. SEAWELL (MSB# 105149)

/s/ JOE SAM OWEN (MSB# 3965)

And

**HARRISON COUNTY BOARD OF
SUPERVISORS, and HARRISON COUNTY,
MISSISSIPPI, Defendants**

By: /s/ TIM C. HOLLEMAN (MSB# 2526)

CERTIFICATE OF SERVICE

I, Daniel T. Seawell, of the law firm Owen, Galloway, & Myers, P.L.L.C., do hereby certify that I have this date electronically filed the foregoing *DEFENDANTS' AMENDED MOTION FOR RESTRICTED ACCESS* with the Clerk of the Court using the ECF system, which served a copy to all counsel record.

SO CERTIFIED, this the 11th day of December, 2017.

/s/ DANIEL T. SEAWELL (MSB# 105149)

JOE SAM OWEN (MSB# 3965)
DANIEL T. SEAWELL (MSB# 105149)
OWEN, GALLOWAY & MYERS, P.L.L.C.
1414 25th Avenue
Post Office Drawer 420
Gulfport, MS 39502-0420
TEL: (228) 868-2821
FAX: (228) 864-6421
EMAIL: jso@owen-galloway.com
dts@owen-galloway.com